

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WAYNE WELMON, Individually and on Behalf of
all others similarly situated,

Plaintiff,

vs.

CHICAGO BRIDGE & IRON CO. N.V.,
GERALD M. GLENN, ROBERT B. JORDAN, and
RICHARD E. GOODRICH,

Defendants.

Case No. 06-CV-01283 (JES)

ELECTRONICALLY FILED

**NOTICE OF MOTION FOR AWARD OF ATTORNEYS'
FEES AND REIMBURSEMENT OF EXPENSES**

To: All Counsel:

PLEASE TAKE NOTICE, that upon the accompanying Joint Declaration of Robert M. Roseman, Mark S. Willis, and Barry A. Weprin in Support of Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation of Settlement Proceeds and Plaintiffs' Motion for Award of Attorneys' Fees and Reimbursement of Expenses, dated May 28, 2008, and the exhibits thereto; the accompanying Plaintiffs' Memorandum of Law in Support of Their Motion for an Award of Attorneys' Fees and Reimbursement of Expenses; and all prior papers and proceedings herein, Plaintiffs' Co-Lead Counsel Spector Roseman and Kodroff, P.C., Cohen, Milstein, Hausfeld & Toll, P.L.L.C., and Milberg LLP, hereby move this Court, pursuant to Rule 23(h) of the Federal Rules of Civil Procedure, for an order awarding: (i) attorneys' fees in the amount of 30% of the Gross Settlement Fund; (ii) reimbursement of expenses in the amount of \$259,694.89; and (iii) reimbursement in the amount of \$24,200 to Lead Plaintiff Fortis Investment

Management N.A./S.A., in the amount of \$35,325 to Lead Plaintiff Metzler Investment GmbH, and in the amount of \$3,300 to Walter J. Mundy for their reasonable costs and expenses (including lost wages) directly related to their representation of the Settlement Class.

Dated: May 28, 2008

Respectfully submitted,

**SPECTOR ROSEMAN & KODROFF,
P.C.**

/s/ Robert M. Roseman

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